

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

PLAINTIFF,

v.

VOLVO CONSTRUCTION EQUIPMENT
NORTH AMERICA, INC., et al.,

DEFENDANTS.

CIVIL ACTION NO. 6:10-CV-0327-LED-JDL

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND CERTAIN DEADLINES

Plaintiff Innovative Global Systems, LLC (“IGS”), Caterpillar, Inc. (“Caterpillar”), Volvo Construction Equipment North America, Inc. (“Volvo Construction”), Volvo Trucks North America, Inc. (“Volvo Trucks”) and StarTrak Systems, LLC (“StarTrak”) (collectively referred to herein as “Parties”) jointly file this Unopposed Motion to Extend Certain Deadlines, and in support thereof, shows the Court the following:

Pursuant to the Court’s Order on the Joint Motion to Extend Certain Deadlines of June 27, 2011 [D.I. 211] the deadline for the parties to comply with P.R. 4-3, exchange privilege logs and to provide information to the Court regarding proposed technical advisors is currently July 8, 2011.

The parties also request to extend the July 11, 2011 deadline to comply with P. R. 4-5(a) and the July 14, 2011 deadline to submit Tutorials to the Court pursuant to the Court’s Docket Control Order dated December 21, 2010 [D. I. 165]

The only four remaining defendants of the initial twelve in this case are Caterpillar, Volvo Construction, Volvo Trucks, and StarTrak.

The parties are within a few days of settling the case and therefore request an extension until July 22, 2011 to serve their respective privilege logs, comply with P.R. 4-3, provide the Court information regarding proposed technical advisors, comply with P. R. 4-5(a) and submit their tutorials to the Court.

This extension is not sought for delay and such an extension will allow the parties to finalize their settlement agreements.

WHEREFORE, PREMISES CONSIDERED IGS, Caterpillar, Volvo Construction, Volvo Trucks, and StarTrak respectfully request the Court enter an order granting an extension of the above deadlines until July 22, 2011.

DATED: July 8, 2011

Respectfully submitted,

/s/ Michael T. Cooke (with permission)
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Respectfully submitted,

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STARTRAK SYSTEMS, LLC, VOLVO
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AMERICA, INC. AND VOLVO TRUCKS
NORTH AMERICA, INC.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of July, 2011, I electronically filed the foregoing document with the clerk of the Court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Gary J. Fischman
Gary J. Fischman